

ACLU OF HAWAII FOUNDATION

Case No. 1:18-cv-00477-LEK-RT

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[CIVIL RIGHTS ACTION]

[CLASS ACTION]

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

A.B. and A.M.B., by their parents and
next friends, C.B. and D.B., and T.T.,
by her parents and next friends, K.T.
and S.T.,

Plaintiffs,

vs.

HAWAII STATE DEPARTMENT OF
EDUCATION and OAHU
INTERSCHOLASTIC
ASSOCIATION,

Defendants.

Case No. 1:18-cv-00477-LEK-RT

[CIVIL RIGHTS ACTION]

**PLAINTIFFS' MOTION FOR
LEAVE TO FILE SECOND
AMENDED COMPLAINT;
MEMORANDUM IN SUPPORT
OF MOTION; EXHIBIT 1
(PROPOSED SECOND
AMENDED COMPLAINT);
EXHIBIT 2 (REDLINED
PROPOSED SECOND
AMENDED COMPLAINT);
CERTIFICATE OF SERVICE**

[CLASS ACTION]

**PLAINTIFFS' MOTION FOR LEAVE TO FILE SECOND AMENDED
COMPLAINT**

Plaintiffs A.B. and A.M.B., by their parents and next friends, C.B. and D.B.,
and T.T., by her parents and next friends, K.T. and S.T., by and through their
counsel (together, "Plaintiffs"), hereby move this Court for leave to file a Second
Amended Complaint in the above-captioned lawsuit. Plaintiffs seek to amend their
Title IX civil rights Complaint to add one additional plaintiff and putative class
representative, A.P.

Counsel for Plaintiffs asked counsel for Defendants to stipulate to the filing of the Second Amended Complaint, but counsel for Defendants would not agree.

This Motion is brought pursuant to Rules 7 and 15(a)(2) of the Federal Rules of Civil Procedure and Rule 7.2 of the Local Rules for the U.S. District Court for the District of Hawaii. This Motion is supported by the attached Memorandum, the attached exhibits, the records and files in this case, and any additional matters that may be presented at or before hearing.

DATED: Honolulu, Hawaii, August 21, 2019.

Respectfully submitted,

/s/ Jongwook “Wookie” Kim
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